

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

GUSTAVO ROMANELLO and ACELA)	
ROMANELLO,)	
Plaintiffs,)	
)	
v.)	
)	
BANKUNITED, INC., TRUSTEE)	
SERVICES OF CAROLINA, LLC, BROCK)	
& SCOTT, PLLC, RAGSDALE LIGGETT,)	
PLLC and ASHLEY H. CAMPBELL,)	
)	
Defendants.)	

Case No. 5:12 CV 371-FL

**MEMORANDUM OF LAW IN SUPPORT
OF MOTION TO STAY DISCOVERY**

Defendants Ragsdale Liggett, PLLC and Ashley H. Campbell (“moving Defendants”), by and through counsel, move the Court to stay Discovery pending the ruling on the moving Defendant’s Motion to Dismiss the Amended Complaint. It is respectfully submitted that the Court’s ruling on the moving Defendant’s pending Motion to Dismiss may likely dispose of this action in its entirety. Accordingly, compliance with the Discovery obligations set forth in the Federal Rules and Local Rules would be premature and the ends of justice and judicial economy would be best served by staying all pre-trial deadlines and Discovery pending resolution of the moving Defendants Motion to Dismiss.

The Moving Defendants respectfully request that the Court enter the proposed Order staying Discovery submitted by Defendant Brock & Scott staying Discovery.

This the 4th day of September, 2012.

MANNING FULTON & SKINNER, P.A.

By: /s/ J. Whitfield Gibson
Robert S. Shields Jr., Esq. NCSB #10034
J. Whitfield Gibson, NCSB #41261
3605 Glenwood Avenue, Suite 500
Raleigh, NC 27612
Phone: (919) 787-8880
Facsimile: (919) 325-4621
*Counsel for Ragsdale Liggett, PLLC and
Ashley H. Campbell*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **MEMORANDUM OF LAW IN SUPPORT OF MOTION TO STAY PRETRIAL DEADLINES AND DISCOVERY** was filed with the Clerk of Court using the CM/ECF System which will send notification of such filing to the following

Gustavo Romanello
Acella Romanello
5448 Thunderidge Drive
Raleigh, NC 27610
Pro Se Plaintiffs

Travis Emil Menk
Brock and Scott, PLLC
5121 Parkway Plaza Blvd., Suite 300
Charlotte, NC 28217-1965
Telephone: 704-643-0290
Fax: 704-369-0760
Email: travis.menk@brockandscott.com
Counsel for Brock & Scott, PLLC

Sean Partrick
Yates McLamb & Weyher, L.L.P.
421 Fayetteville Street, Suite 1200
Raleigh, NC 27601
Counsel for BankUnited

Travis Emil Menk
Brock and Scott, PLLC
5121 Parkway Plaza Blvd., Suite 300
Charlotte, NC 28217-1965
Telephone: 704-643-0290
Fax: 704-369-0760
Email: travis.menk@brockandscott.com
Counsel for Trustee Services of the Carolinas, LLC

This the 4th day of September, 2012.

MANNING FULTON & SKINNER, P.A.

By: /s/ J. Whitfield Gibson
Robert S. Shields Jr., Esq. NCSB #10034
J. Whitfield Gibson, NCSB #41261
3605 Glenwood Avenue, Suite 500
Raleigh, NC 27612
Phone: (919) 787-8880
Facsimile: (919) 325-4621
*Counsel for Ragsdale Liggett, PLLC and
Ashley H. Campbell*